

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
CLINTON D. JOHNSON : No. 20-10397-ELF  
Debtor

ANSWER TO MOTION FOR RELIEF OF HSBC AND CERTIFICATE OF SERVICE

1 - 5. Admitted.

6 - 9. Denied. Debtor paid \$3,500 in December. In addition, the mortgage company has been in touch with the debtor and has offered him to apply for a Loan Modification. They spoke to him this morning and informed him that they need one more document and would have a decision for him this week.

WHEREFORE Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief from Automatic Stay.

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor

Dated: 1/18/2021

A copy of this response is being served on Rebecca Solarz, Esq., and the Chapter 13 Trustee, by Electronic Mail.

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor